

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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:
UNITED STATES OF AMERICA, :
:
-against- :
MATTHEW BRENT GOETTSCHE, : Crim. No. 2:19-cr-877-CCC
RUSS MEDLIN, :
JOBADIAH SINCLAIR WEEKS, : **NOTICE OF MOTION**
JOSEPH FRANK ABEL, and :
SILVIU CATALIN BALACI :
:
Defendants. ----- X

PLEASE TAKE NOTICE that on Monday, October 17, 2022, at 10 a.m. or as soon thereafter as counsel may be heard, the undersigned attorney for Defendant Matthew Brent Goettsche shall move before Hon. Michael A. Hammer, U.S.M.J. for an Order pursuant to Civil Local Civil Rule 5.3(c) to seal the unredacted version of Defendant Goettsche's Motion to Modify Conditions of Pretrial Release (the "Filing").

The undersigned shall rely upon the annexed Declaration of Rodney Villazor and requests that this motion be decided on the papers submitted without oral argument. Pursuant to Local Civil Rule 5.3(c)(1), the undersigned has conferred with counsel for the government who stated that they do not intend to oppose the motion to seal.

DATED: September 21, 2022

Respectfully submitted,

s/ Rodney Villazor

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